

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROSLYN LA LIBERTE,

Plaintiff,

- against -

JOY REID,

Defendant.

Case No.: 1:18-cv-05398-DLI-VMS

**SUPPLEMENTAL DECLARATION
IN SUPPORT OF DEFENDANT'S
MOTION TO REVOKE THE *PRO*
HAC VICE ADMISSION OF L. LIN
WOOD**

JOHN H. REICHMAN declares under penalty of perjury and pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of Johnreichmanlaw LLC, attorney for Defendant Joy Reid, along with Gibson, Dunn & Crutcher LLP. I submit this supplemental declaration to alert the Court to new, pertinent information concerning Ms. Reid's motion to revoke the *pro hac vice* admission of L. Lin Wood, one of Plaintiff's attorneys.

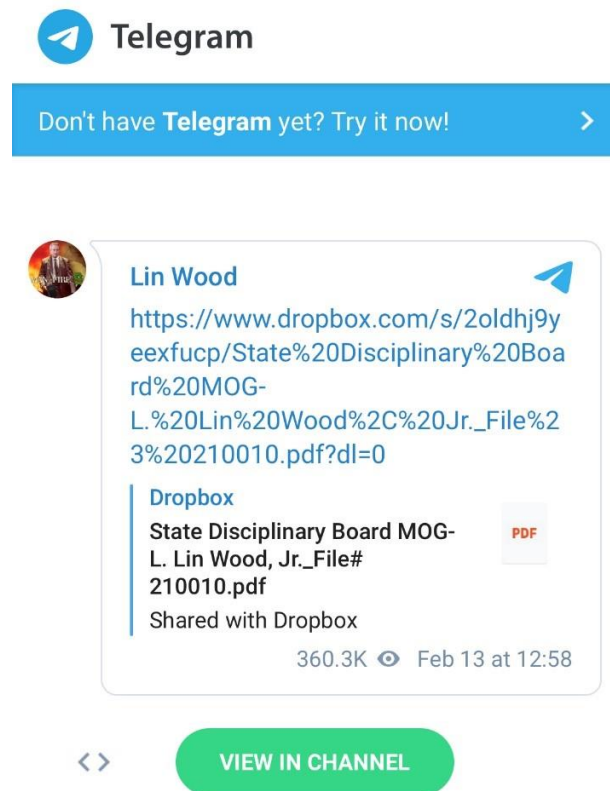
2. On February 14, 2021, by way of a Telegram posted by Mr. Wood on February 13, 2021 and after I had already submitted my declaration in support of Ms. Reid's reply memorandum, I learned that the State Bar of Georgia is seeking to discipline Mr. Wood due to multiple violations of the Georgia Rules of Professional Conduct.

3. The State Disciplinary Board of the Georgia State Bar submitted its grievance against Mr. Wood on February 5, 2021, three days before Mr. Wood submitted an affidavit to this Court falsely claiming he is "a member in good standing of the Bar of the State of Georgia. . . ." Dkt. 66-3 ¶ 1.

4. The full 1,676 page grievance against Mr. Wood, last accessed on February 15, 2021, is available at the following link:

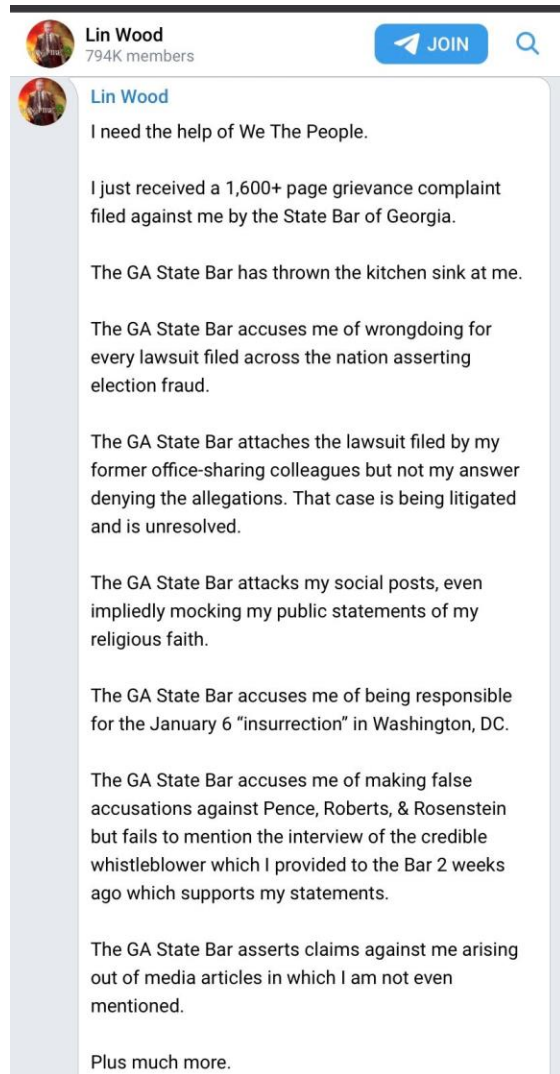
https://www.dropbox.com/s/2oldhj9yeexfucp/State%20Disciplinary%20Board%20MOG-L.%20Lin%20Wood%2C%20Jr._File%23%20210010.pdf?dl=0. Though the grievance is

labeled “confidential,” Mr. Wood himself posted a link to the grievance publicly on his Telegram account on February 13, 2021:



5. The grievance attaches information indicating “Mr. Wood may have engaged in conduct in violation of Georgia Rules of Professional Conduct 1.1, 1.2, 3.1, 3.3, 4.1 and 4.4, and Bar Rule 4-104.” *Id.* at 1.

6. On February 13, 2021, Mr. Wood posted to Telegram that he had received the “1,600+ page grievance complaint filed against [him] by the State Bar of Georgia,” and explained that he “need[s] the help of We the People”:



7. Later that day, Mr. Wood posted again to his Telegram, asking for the “help of an Army of Patriots” with uncovering information about the list of members of the State Disciplinary Board. He posted a list of the members and asked, “If you have any information that might impact the ‘competency, qualifications or objectivity’ of any members, would you email the information to me . . . ?” He said this type of information could include “their social media posts, political affiliations, representative clients (for example, what if one or more of them represented Dominion), [and] lawsuits filed against them”:



Lin Wood

Under the "rules" of the State Bar of GA, I have "the right to challenge the competency, qualifications or objectivity of any member of the State Disciplinary Board" but I have to do so within 10 days.

I could use the help of an Army of Patriots due to the time limitation.

Below is a list of the members provided to me by the State Bar today.

If you have any information that might impact the "competency, qualifications or objectivity" of any members, would you email the information to me at lwood@fightback.law?

Their social media posts, political affiliations, representative clients (for example, what if one or more of them represent Dominion), lawsuits filed against them, etc. would all potentially provide me with relevant information that could form the basis of a challenge.

If you have time, would you help me?

God bless you. - Lin 🙏❤️🇺🇸 214.7K 👁 22:29 ,

8. Mr. Wood has not advised this Court of the grievance submitted by the State Bar of Georgia.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 15, 2021

JOHN H. REICHMAN